

ATTORNEYS AT LAW

Writer's Direct: (410) 234-2621  
Writer's Email: kp@kimparkerlaw.com

October 5, 2016

**VIA ELECTRONIC FILING**

The Honorable James K. Bredar  
United States District Court of Maryland  
101 W. Lombard Street  
Baltimore, Maryland 21201

Re: **Harris vs. HABC, et al**  
**Civil Case No.: 14-3395**

Your Honor:

Pursuant to the Court's September 19, 2016, Order, the parties have scheduled depositions of their respective clients. Defendant's Counsel has agreed to produce a knowledgeable witness on September 27, 2016, but only from 9:30 a.m. through 12:30 p.m. I objected, in light the fast approaching discovery deadline, and given the scope of the deposition. Defendant's Counsel suggested an alternative date of October 31, 2016. When I indicated that I was available, Defendant's Counsel attempted to limit the deposition from 10:00 a.m. until 2:00 p.m. or four (4) hours., despite Federal Rule of Civil Procedure 30(d)(1), which provides that: **"Unless otherwise stipulated or ordered by the court, a deposition is limited to 1 day of 7 hours"**. Plaintiff objects to the Defendant's attempt to limit the time provided by FRCP 30(d)(1).

Moreover, it is important to note that the Corporate Designee, Kimberly Graham, was recently hired with the Defendant and is it therefore highly doubtful that she would be able to testify to the list of topics indicated in the Plaintiff's Notice of Deposition, given the vast areas of examination. (Exhibit A).

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Plaintiff is therefore requesting a telephonic conference to address Defendant's Counsel attempts to limit the time Plaintiff can depose her client, given the approaching discovery deadline and the obvious prejudice it would cause my client.

Thank you in advance for your consideration.

Very truly yours,

THE LAW OFFICES OF KIM PARKER, P.A.

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Kim Parker, Esq

cc: Carrie Blackburn Riley, Esquire  
Via Electronic Notice